

UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
05 JUN 24 PM 3:06
NORTHWEST DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

Cooper Tire & Rubber Company,

Plaintiff,

v.

Jason M. Shinn,

Defendant.

) Case No. 3:05-CV-7063

) [Honorable David A. Katz]

) DEFENDANT'S MOTION TO ALLOW
) MCHUGH, DENUNE & MCCARTHY,
) LTD. TO WITHDRAW AS COUNSEL OF
) RECORD

) **CASE FILED UNDER SEAL**

) John J. McHugh, III (0019750)

) Stephen B. Mosier (0019769)

) 5580 Monroe Street

) Sylvania, Ohio 43560

) Telephone: (419) 885-3597

) Facsimile: (419) 885-3861


) Trial Counsel for Defendant

Pursuant to Local Civil Rule 83.9, defendant Jason M. Shinn hereby moves for entry of an order allowing the lawfirm of McHugh, DeNune & McCarthy, Ltd., and attorneys John J. McHugh, III and Stephen B. Mosier, to withdraw as counsel of record for defendant in this case.

Defendant, Jason M. Shinn, a duly-licensed attorney at law, wishes to represent himself for all necessary concluding activities in this case, and is fully ready and capable of doing so vigorously and effectively. Continuity of representation is assured, and no impediment to the progress of this case will be created by the granting of this motion. Tendered herewith for the convenience of the Court is a proposed form of order granting the relief requested.

Of Counsel for Defendant:

McHUGH, DeNUNE & McCARTHY, LTD.
5580 Monroe Street
Sylvania, Ohio 43560



John J. McHugh, III (0019750)
Stephen B. Mosier (0019769)
5580 Monroe Street
Sylvania, Ohio 43560
Telephone: (419) 885-3597
Facsimile: (419) 885-3861
Trial Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant's Motion to Allow McHugh, DeNune & McCarthy, Ltd. To Withdraw As Counsel of Record was duly served by ordinary U.S. mail, postage prepaid, upon counsel for plaintiff, William M. Connelly, at his address of Connelly, Jackson & Collier, LLP, 405 Madison Avenue, Suite 1600, Toledo, Ohio 43604, this 23rd day of June, 2005.

Of Counsel for Defendant:

McHUGH, DeNUNE & McCARTHY, LTD.
5580 Monroe Street
Sylvania, Ohio 43560


John J. McHugh, III (0019750)
Stephen B. Mosier (0019769)
5580 Monroe Street
Sylvania, Ohio 43560
Telephone: (419) 885-3597
Facsimile: (419) 885-3861
Trial Counsel for Defendant